

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

v.

TANNER S. ADAM, JONATHAN L. ADAM, TRITEN
FINANCIAL GROUP, LLC, and GCZ GLOBAL LLC,*Defendant*

Civil Action No. 1:24-cv-03774-MHC

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Payward Ventures, Inc., d/b/a Kraken

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit A

Place: Kristin W. Murnahan
US Securities & Exchange Commission, 950 East
Paces Ferry Road, N.E., Suite 900, Atlanta, GA 30326

Date and Time:

11/12/2024 9:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/23/2024

CLERK OF COURT

OR

*Kristin W. Murnahan**Signature of Clerk or Deputy Clerk**Attorney's signature*The name, address, e-mail address, and telephone number of the attorney representing *(name of party)*

U.S. Securities and Exchange Commission, who issues or requests this subpoena, are:

Kristin W. Murnahan, 950 E. Paces Ferry Rd., N.E., Ste. 900, Atlanta, Ga. 30326, murnahank@sec.gov, (404) 842-7655

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:24-cv-03774-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

A. DEFINITIONS & INSTRUCTIONS:

1. “**Payward Ventures, Inc., d/b/a Kraken,**” or “**Kraken**” means the entity doing business under the name “Kraken,” a/k/a “Payward Ventures, Inc.,” including parents, subsidiaries, affiliates, predecessors, successors, officers, directors, employees, agents, general partners, limited partners, partnerships and aliases, code names, or trade or business names used by any of the foregoing.
2. Reference to an **Entity** shall also include that entity’s corporate parents, subsidiaries, affiliates, predecessors, and successors, as well as trade names, or business names used by, or formerly used by the entity.
3. Reference to a **Person** shall also include that person’s trusts, affiliates, employees, agents, partners, and independent contractors, as well as aliases, code names, trade names, or business names used by, or formerly used by, the person.
4. The term “**Document**” means any written, printed, or typed matter including, but not limited to all drafts and copies bearing notations or marks not found in the original, letters and correspondence, interoffice communications, slips, tickets, records, worksheets, financial records, accounting documents, bookkeeping documents, memoranda, reports, manuals, telephone logs, telegrams, facsimiles, messages of any type, telephone messages, voice mails, tape recordings, notices, instructions, minutes, summaries, notes of meetings, file folder markings, and any other organizational indicia, purchase orders, information recorded by photographic process, including microfilm and microfiche, computer printouts, spreadsheets, blockchain identifiers (e.g., hashes, pointers, etc.) to documents stored on a blockchain, and other electronically stored information, including but not limited to writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations that are stored in any medium from which information can be retrieved, obtained, manipulated, or translated.
5. The term “**Activity**” means any transaction, trade, deposit, withdrawal, swap, internal transfer, bid, ask, offer, purchase, sale, redemption, reward, loan, staking, receipt or payment of fees, or any other event captured, recorded, or generated by Kraken.
6. The term “**Order**” means any request, instruction, notes, or directive to conduct any Activity.
7. The term “**Communication**” means any correspondence, contact, discussion, e-mail, instant message, or any other kind of oral or written exchange or transmission of information (in the form of facts, ideas, inquiries, or otherwise) and any response thereto between two or more Persons or entities, including,

without limitation, all telephone conversations, face-to-face meetings or conversations, internal or external discussions, or exchanges of a Document or Documents.

8. The term “**Concerning**” means directly or indirectly, in whole or in part, describing, constituting, evidencing, recording, evaluating, substantiating, concerning, referring to, alluding to, in connection with, commenting on, relating to, regarding, discussing, showing, analyzing or reflecting.
9. The following rules of construction apply to this attachment:
 - a. the functional words “**any**” and “**all**” shall be deemed to include the other functional word;
 - b. the connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the attachment all responses that might otherwise be construed to be outside of its scope;
 - c. the use of the singular form of any word includes the plural and vice versa; and
 - d. the term “including” means including, but not limited to.
10. Please put an identifying notation on each page of each document to indicate that it was produced by your bank, produced in this matter, and the page number of all the documents submitted.
11. The term “**Relevant Period**” shall mean the time period beginning with account inception or account application date, whichever is earlier. Please initially produce the items called for in this subpoena from account inception through the date of this subpoena. Thereafter, please produce the items called for in this subpoena that were obtained or created following the date of this subpoena as requested by Commission staff.

B. DOCUMENTS TO BE PRODUCED

1. Documents sufficient to identify all Kraken accounts associated with the transactions listed below (the “Transactions”), including:

| Txn Hash | Sending Address | Receiving Address | Amount | Asset |
|--|--|--|---------------|--------------|
| 0x2266a73e0ecd16840345173605828da1984dcf3c47b36a377be3347e89e1aeeb | 0x1aDb69bfF4737aF3Ce1B6Cd078D920b4975a89FD | 0xd3d7a33e97c9971831cc097f6aad28b60632b418 | 8,000 | USDT |
| 0xb810d47c035c5101e290e3c00e8af29ec2669c17c8b38ca70ed9f2805e7cb8bf | 0x72D4Ff80Bc4DFaB5184c702aC5F217DeF992b283 | 0xcb2417A145bDa00ebd216A9B6d91dC50c5a3f924 | 100.788454 | USDT |
| 0x47094baf7f746c516423ea77ce87c47ac34ea9e5ac65081fbebddd70c205aa3 | 0x72D4Ff80Bc4DFaB5184c702aC5F217DeF992b283 | 0xcb2417A145bDa00ebd216A9B6d91dC50c5a3f924 | 410 | USDT |
| 0x03b309ebc1799bfc26f8ccf9cff9dfb4ecdc5c6ddb80202b06bac3095fdb11b2 | 0xD6D1BD5071fBc8B03219475a1a2D9A9b55E19C69 | 0x7DF5665B4Bee8E4644b025D49CF1A2213707d469 | 12,150 | USDT |
| 0xd498b18e5dfca69128a126fc115f39d7f0b3545a9734b9eed155f0ad1c82e55e | 0xD6D1BD5071fBc8B03219475a1a2D9A9b55E19C69 | 0x7DF5665B4Bee8E4644b025D49CF1A2213707d469 | 8,800.00 | USDT |
| 0xda36640e5426edd08fa2c626a819eecedc0de4b3383c365d12333e0a4b0597c8 | 0xfde7bb38269961fb6b417e0e24ed0c542621c4f1 | 0x49185294c5da50be372ed3d51d02eb592a11a791 | 8,000 | USDT |
| 0x4f777b2bdc2db6b5fc82ef08159df238fb11ba310edf2183a973e653b5164269 | 0xfde7bb38269961fb6b417e0e24ed0c542621c4f1 | 0x49185294c5da50be372ed3d51d02eb592a11a791 | 26,900 | USDT |
| 0x68a2a4766b7d843ac6b78d8aa2233006143f86191650c67850868a4ad8a744dc | 0x267be1c1d684f78cb4f6a176c4911b741e4ffdc0 | 0x72D4Ff80Bc4DFaB5184c702aC5F217DeF992b283 | 0.0315035 | ETH |
| 0x21df125908f763f35c1219dcb4105ee500fdd96a38e16df979f642a267d504b0 | 0x72d4ff80bc4dfab5184c702ac5f217def992b283 | 0x1eb6633ca21244ba816dd624b28adb3319aca271 | 5,000 | USDT |

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|--|---|--|-------------|------|
| 0x3ae1d8bfd6453a8892f2ec21bf539d4ddeb82f507c1f5cd20ab04bb483a1fcb3 | 0x72d4ff80bc4dfab5184c702ac5f217def992b283 | 0x1eb6633ca21244ba816dd624b28adb3319aca271 | 15,000 | USDT |
| 2V4HwNRj3BaiWqWqL7D1zbPwtBxomdardA2ugz8Euy17Kxc3zdsAH87Ti hGsD7Dk73BSWkwuEVEEWKRcq6DbmDCX | FWznbCNXWQuHTawe9RxxvQ2LdCENssh12dsznf4RiouN5 | p9amKcZseMWwPtodqN2YuX6LUDrKh2YyhEeJXZa1sYV | 2 | SOL |
| 4MUv4XkpMvy2zUZvwqRz1jPCWNf4N74kaLfvc9SUSkroGMHfEt1nRCZgwVWyyjJBZWuN KtfYgHgKPruZShvRJmF9N | FWznbCNXWQuHTawe9RxxvQ2LdCENssh12dsznf4RiouN5 | p9amKcZseMWwPtodqN2YuX6LUDrKh2YyhEeJXZa1sYV | 2.5 | SOL |
| 3b6UAVzJgfy3UUXNEXGU8DzR17ay54df1Nbu3E5uk6ibD1qeo4UQFQwSNatsGEXojC6EdoevuYQBsxYgfpeB2CyX | p9amKcZseMWwPtodqN2YuX6LUDrKh2YyhEeJXZa1sYV | ERveDac9123cm1pUcfMyK9hzeZZSvq3fLC1gzjMubSb6 | 218 | SOL |
| 2sKBen9XjXvYvp xG366k4XMHtm7naMwf9XkETWwtcxrCCctjrtt3AXNP e8FEAJE2dzfV1e3EprdPip8Ew7MikZhr | FWznbCNXWQuHTawe9RxxvQ2LdCENssh12dsznf4RiouN5 | FX1SREB3e4rhnJ2dqPDA6uy5LCQzdg7rPVQQPGV7NFAN | 5000.7501 | USDT |
| 5CiQ838zUfgcARstacpim2snahqGsHPsLixXjuxV3HSL8qBsPU2CYvLFBdxzMQ7PMpiFhtUwL RNwSvcjmZWR9EFd | FWznbCNXWQuHTawe9RxxvQ2LdCENssh12dsznf4RiouN5 | FX1SREB3e4rhnJ2dqPDA6uy5LCQzdg7rPVQQPGV7NFAN | 30006.3013 | USDT |
| 5wyoqHUUQceWCiEBcu32KMDMDeXmPwuL6Lnpw78zVPj1yuk4t5mQprovaJednQkF21Td iFKMThZSkAXcA Esagdfy | FWznbCNXWQuHTawe9RxxvQ2LdCENssh12dsznf4RiouN5 | FX1SREB3e4rhnJ2dqPDA6uy5LCQzdg7rPVQQPGV7NFAN | 500040.0041 | USDT |

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|--|--|---|-------------|------|
| 2RDAFKPJpXyQ3 qQJLTyDYebcRy3 9uLJixS8tPn46Nkc 9KHUt6TRcvknCy aScgiBZSPgv9agD fxrCgKqXP9mcVV PH | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 319071.5784 | USDT |
| grtaCcL9efaHrMy1 142jYLEykhZXRp HyJJVRCTQJrjawk skLaid7ri1Z5JWV7 DRGNUMtHHeFje 5rsq7DKBr69Up | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 449999.5 | USDT |
| 35RfAydinQ7h3EJ QtsSKVLJbGKH7 KhbdVP5voYQSvx 1kavbnaCHnRUc2 uyDtrnLJT6SyCo QhMYc1aE1XvXQ axS3 | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 495.055 | USDT |
| 51A6ydDHCvjJo1d qKMjv37FDRxcwa VgDpULAj5PBfv5 wWrKZbF1TLEB XXUQ9ahPtcRhvL enc4a7TcJnN1J9c5 qnB | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 100008.0017 | USDT |
| n5jzTxusygzFru6dJ Batrnawmi2VUFrf o684SC7RRcGKf9 DLVWUoh1StFHJ ukgoC3JUjj4b8sp1 uNiQnxG71j5v | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 50003.5014 | USDT |
| 4KXR4pacXm2ZH KKkg4H2hxsh8DH adpe7jAxKz4zCgZ BGFj38FQnViGSL F74ETAqYiHibU9 zR3x3A67WkjQ8N PdDR | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 50005.5022 | USDT |
| mHeEArHDZfMK GqybUhAACsFd7a aQ53gxVW9uobpq ogZWJMCooGX4 WLEWMBcPWAu | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 39999.0004 | USDT |

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|--|--|---|------------|------|
| nNhSvT2vebveajQ sN2aKZudE | | | | |
| sBxYXYypELug wqFnEMRo93WV XVp1DnQxupXUY UuXHL3f7SyVGyf eT8iDCYt69sdVJD ZMB37HRN93t6Q dBrVFHz | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 20016.8238 | USDT |
| 5TUYiVoAastwaF pA4A6XnYmVJY ZSwU79kAmn8oh U91Kb3c8yWHe8 R5CYontgAsnMU4 j5Uh6TYHCu4u9V 7QxUs4TR | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 49990.0005 | USDT |
| 5uozyvNNQzXrbB ahnTLaEuhsL4y7X omaiiqZnbk9JMqc VhDsn2AeNioEw8 pgaQALWsykHM xPgZPn5FLGndi58t G | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 19995.2 | USDT |
| 38yqfzqjkYfwscZq ZDSmugA7D97Vb kkmbNB4PYw9oC qd3c1gjRSK1HeB BpjdUrkh1GxHHG kDmSNxZJ9rcEQy thSi | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 19998.4006 | USDT |
| WFJFEvxMMMen x8ofVXzq9oVr5W DfxykDkqxQ7NvY YPpeysjY54h5vuJp XCKbomov6ssRqz JxngjBi8L5XWx7r UE | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 20100.2274 | USDT |
| 5qLLSQHV9jUqFj C2C1g5dKKxrX2L UbrdPkKvpWzBE UjyavA4ujyQMMZ pow7UHeqgmTT 2QgwY2AkczAi8 GJvWXu | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 19993.4001 | USDT |
| 3ugWeLwv2fvNw Q6ovKkWiKZKuc | FWznbCNXWQu HTawe9RxxQ2L | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd | 19996.8002 | USDT |

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|--|--|---|------------|------|
| 6MCie51muc7orwn XaythvSik9yPLcjy Rjntvkw7yJom9zjd 38ndyzboRhfnqbt | dCENssh12dsznf 4RiouN5 | g7rPVQQPGV7NF AN | | |
| q1KwqfE1aHF7Fr BRFBcbc2B2aV2c bik6jTVpFy2TZsQ QcccrBPNWzBWS 42W8EWQ3CZHir qVVKsEavciDH2Z TsB9 | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 19995.4 | USDT |
| BPUALERDCPA MijED6nBiHq7Lg SKC48kfxNuAvQ N8geU2quJmMW5 QL7Rx2zhrALvMb CMr6gJPCiqpcg5c Cn1KaKY | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 19992.8002 | USDT |
| 4uGCC1w1yriEPep PyrGZ2qwS6eZvM dvn8sTqykAK8v5 XLV9tT7X9s3X6sj 4jdtPukzh2JTsqbD b6sb8Ab9qBBMc M | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 9992.2008 | USDT |
| u8RBX8jFc7HKX UYbUjGwkZE7ru 6HnjKvB6S9tkjg8u P7fX51DJj8y328W ZhxDdpDHKFGgp CPf22shErr2dNvL Lp | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 20081.542 | USDT |
| pHu87G2Mz3went N7CjpvzThpjZx69 FeJ8vtuydXJPP3D Ni8E8D5AvWX5P w66Q7ruvAuRwW xmcqob7BFqv5Ky 2Ug | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 20088.1683 | USDT |
| 67UxQWVpgY4Q CoEvgDbTs5U1SR qGuk8MM1WuzZ QbfbMwqa9cctsw mvEE9YML7RR4 EaNr3eq5srUz22W xBNctRpwg | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhJ2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 15080.6473 | USDT |

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|--|--|--|------------|------|
| mqsN4CvdHJWR 3N7mhn8aEWwsqf R8eoD5uSuPW3ios xtnBPqp7b5XSwJ3 2UouHzv5QGDEx 9NKZBNYVjNwg NPdfx | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhNj2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 10096.7709 | USDT |
| 2fe7BUck64eYy7j JLNCrTwo1VKEJr 6eQDyR6fTVQqih hsXQ5UdWyimnRi vKQaFhdzSL1hoM X397BkxMNxxdz GWkN | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhNj2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 10095.4589 | USDT |
| 4p188JRQcmT3Jpg oo5ALpFFbZyBSq 2bpXsaM3GnxoD7 F8oHC26YdNwuC Vb3HQUpxPAMa KGhR76WxTFAfV nqDpSd5 | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhNj2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 10000.6001 | USDT |
| 4fyAfTqz1xwaeZz 8SkFiWN3MRaFZ yRRYiBcDrNqWe NxBppzPWz79zQi z6u95SGbDveadUk CbiZD8jf8N2k9me rLN | FWznbCNXWQu HTawe9RxxQ2L dCENssh12dsznf 4RiouN5 | FX1SREB3e4rhNj2 dqPDA6uy5LCQzd g7rPVQQPGV7NF AN | 99.815 | USDT |
| 5sBwtre7J9AvYffs f2xYnVmTafecwo wZ25zz1VR9xGVa Jz2prTZg7DWRNb at4BMLrnCXHxbT 3Ju9XNQxHDK1m tg | FX1SREB3e4rhN J2dqPDA6uy5LC Qzdg7rPVQQPG V7NFAN | DYpxew1k1hjMiv Mci5QL4LX51bU QeY6tpjS8TiB3sQ Te | 4000 | USDT |
| 57t5m7CvwpHez5 C23yR46X9oB1ojp 4BkUvk8qbCYZiP TM3pADfBbKZEE As5WUVqHQzWZ qWPBvekvZx2MP 7MA5KL3 | FX1SREB3e4rhN J2dqPDA6uy5LC Qzdg7rPVQQPG V7NFAN | 8cxfQdUxThKFtg2 XmqXMZQpHVeA Ljb1fk4CHfZE3Lni x | 4555 | USDT |
| 5UYBVQf41tbDJ6 knjMXpJEwtqLYJ SSLd7RnDBpd9Q7 MegXUtUs7LEuH | FX1SREB3e4rhN J2dqPDA6uy5LC Qzdg7rPVQQPG V7NFAN | 8cxfQdUxThKFtg2 XmqXMZQpHVeA Ljb1fk4CHfZE3Lni x | 5400 | USDT |

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|--|--|--|-------------|------|
| RPH7hCbZZM6J9 qt7NhHRpHXXeed M6ctTw | | | | |
| 5k73N36yM2VGpz G9YiJ2ZceiQzevjV hovQiT2kWUL2Ff PaQLdBpHKsPB9q LKWqWCN1nfLK TDBiSYPGNVv59 DQLx7 | FX1SREB3e4rhn J2dqPDA6uy5LC Qzdg7rPVQQPG V7NFAN | 2j5WSeuJLE9587B Pwc3abYnCCKrtn RqAYDWVrosZyD gC | 1300 | USDT |
| 2QXsADtnHWEiV M38uwNt4LU81t5 yzADPTe2FaMP3F S4v9kYCxCH22Tt PiFkGmooYUfx6f LRoeJ5gd8idQJE8 w35N | FX1SREB3e4rhn J2dqPDA6uy5LC Qzdg7rPVQQPG V7NFAN | 2j5WSeuJLE9587B Pwc3abYnCCKrtn RqAYDWVrosZyD gC | 2000 | USDT |
| 0x7a028840428407 af2e20f20c4a27b35 285191ecf4a8f0a8b 7208a781b7c26402 | 0xc6bed363b30df 7f35b601a5547fe 56cd31ec63da | 0x18c0cd98a747e1 b121cf6995575a55 5da06dcf26 | 339.7259727 | LINK |
| 0xaf158429594900 3b5b7c9bb00571eb ffced71c4c8e9e085 4b4288c681aa533d 6 | 0xc6bed363b30df 7f35b601a5547fe 56cd31ec63da | 0x18c0cd98a747e1 b121cf6995575a55 5da06dcf26 | 1568.674178 | LINK |
| 0x08d6637ccc4141 882a14ea5d934331 d3ac1f195feb58646 39915617ba9dae61 4 | 0xd6d1bd5071fbc 8b03219475a1a2 d9a9b55e19c69 | 0xbe09799afc5612 16ca2b6159ac919a 5e4935b928 | 94000 | USDT |
| 0xeb7c5db46e0300 151110b2ad4776f0 7d4360eeee6d1c7d c27357fbbf4ab8a69 b | 0xd6d1bd5071fbc 8b03219475a1a2 d9a9b55e19c69 | 0xbe09799afc5612 16ca2b6159ac919a 5e4935b928 | 182294 | USDT |
| 0x7aef5e259d6e85 84cadb05aa5fad302 ec3c496b6463c016 ff01b442ed6c29b7b | 0xae2d4617c8623 09a3d75a0ffb358 c7a5009c673f | 0x1adb69bffa737af 3ce1b6cd078d920b 4975a89fd | 20009.8198 | USDC |
| 0x4cdf19f11eb3aaf f3d22081f07b8425 117151811ecccc05 59a8de4d8bccf1adb | 0x89e51fa8ca5d6 6cd220baed62ed0 1e8951aa7c40 | 0x1adb69bffa737af 3ce1b6cd078d920b 4975a89fd | 18804.49093 | USDT |

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|--|--|--|-------------|------|
| 0x2266a73e0ecd16 840345173605828d a1984dcf3c47b36a 377be3347e89e1ae eb | 0x1adb69bff4737 af3ce1b6cd078d9 20b4975a89fd | 0xd3d7a33e97c997 1831cc097f6aad28 b60632b418 | 8000 | USDT |
| ecbe7392b049de09 2bb93acea8fda9ea4 a697de8746f6d70e 3598b2c14348f2f | 3JHEx5xGQGvY 7u61LqCspfptrT7 128aw5N | 3G8YCAHPi8xHR 6XhUyQgHUb6So RRUhmo7D | 0.94574676 | BTC |
| 58Pvhs3Y7uXnpB SYkm5RVeeBX2w YokkgrgSvA8o2Qn jMSM4MYtj5Gco DpP7HnvJpckvZD 6uVVYWZQNAfG 98ZPSKa | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | GnVLR3QViqXTT JLtHDm3NigscGL Dk4CAXdn5Syo95 WvA | 17783.9999 | USDT |
| 4JrPkZby4VFGq4d XphgEt1G4ccsVvT qPALminv3y1HEV vcsCRJwd2qdQFP qRUV8brnnYJzS7 KBGnSF5rGvqU4 wea | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | GnVLR3QViqXTT JLtHDm3NigscGL Dk4CAXdn5Syo95 WvA | 12999.7999 | USDT |
| HgazrFHdJGfj5Snh krTYaDfM1nUmJg ybW6tjYBNqcBY7 yCfwtAA2z4yhp2 QzRQQT8a8dSPjJ xb5Yd55TzB7zEV T | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 2PBV6BVQX17U R97CDwD2MFdvn NdsRnSKaQKKf5 DErMY6 | 8466.939899 | USDT |
| 3FRsZLCJQJsCret uBtmfaixt4erWDn G1pqcUrgscjECaa XoakqHiiwXPHx CxFqxab7CSH4M MdA2otFtWxT4cc Xh | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 2PBV6BVQX17U R97CDwD2MFdvn NdsRnSKaQKKf5 DErMY6 | 5604.7099 | USDT |
| 2fETLJppyR2PZU MKkJGcKnXKM9 68nMfnMuQm6Yf qpjHH9EWZZiwm UZSF6q4gBXrUoz jxBCwAbuTqcXXb JZAotPTE | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 3uW9fnDvsGL96Z CPhV7evZo36GH Wa36M5mBtcQPR w3Xb | 4987.4999 | USDT |
| 39Q6x8YMh5g7Da hK8xmN3N2Wf6w | BWYfaakpoJUsp 5zwhuEdPhA2SY | 3uW9fnDvsGL96Z CPhV7evZo36GH | 3562.4999 | USDT |

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| wQNZKukG35L5T aMhHXCw7PjbYz Ek5EzREsK9z7M DgXogGEnsvazww uXQEE9dB | VWabTwQTe8fX WXjzze | Wa36M5mBtcQPR w3Xb | | |
| C9pst4gmLyuhkQc fEpi3DghP33UGgc NwFTGGVJH1Lg7 XkUU7rBH887qK nQoQDWy2JuXbT nyXjayDZVmBQ6 gSZKz | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | A8XfnFQLWjpE55 ERyZgvKL25nF8R US5rujvzXHscvzV P | 7599.9999 | USDT |
| 4V61SKoVTF5owJ N2GHmZHB5Uep oz49um6jdwKZS4 HKcwSmkxCbcQa p3dEicz89CPAGY KtL4xWmUqMj1q bwpsucgk | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | A8XfnFQLWjpE55 ERyZgvKL25nF8R US5rujvzXHscvzV P | 5699.9999 | USDT |
| 5qE4SB1mPsUwE UP2VBm7Z8FyhN 4oVuABWh7HiNG 4bEbQVxiCmLqT CbLcjMkuxcD1rC gidneLhGpygdYD YJPRAnB | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | HrEBMtiVsFbgeK 3HBGRv3ZRoexG TsmfquwoyJrEtteH 9 | 71.2499 | USDT |
| 5732kU5TfAxugfy pJgWDSsy4zPw8J WQKiLxvTZkA36 ZUPSaZbe5BDcgZ Ns5ic6TG8sFfdDC ojf2NkyBkon8DJir h | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | HrEBMtiVsFbgeK 3HBGRv3ZRoexG TsmfquwoyJrEtteH 9 | 4842.4099 | USDT |
| 58w2yGiJjWxlY6 5kfhHZQk2rp8PP WUubCFzpnTFjsB PljYonNBcLGxBd RrRLQ4LDYSgtLF r5JhtQopDV8HDZ BhE | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | TqjnccEx4aBos9aG GidHWia5bb2Xx6 6bHx8Yswdwd8d | 21.3699 | USDT |
| 5HwzTsxM11imCu 5AMcEtFWLe3a3D 1Eq3xY7HSFPHQ2 CxadKcLmPCAMJ HiHcHgtoJr2ECXp | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | TqjnccEx4aBos9aG GidHWia5bb2Xx6 6bHx8Yswdwd8d | 53.4399 | USDT |

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|--|--|--|-----------|------|
| wzapuzyTkgNDH3 c3Cg | | | | |
| 4jnYQHbyEGXd2 QjFxPEyisJvjYJ6tr xDDkguyb94nuSp HJvTjhEhdaNCJiu dxJNhHN2MJws7 GZphmF12ZHRrGf Ue | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | Ba7fyfDckSdheM1 6MdfvoDjxht3rufA oNM8mmBKmYfR 5 | 356.2499 | USDT |
| CPKecU6ktifV5Mk e1w7GDUK5hTW FPujAYnAe9Dzg4 hgPAfiHYw25QQe ri9ppqxrzQv7bJJ5v 2pMhWTg9kM9M dme | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | Ba7fyfDckSdheM1 6MdfvoDjxht3rufA oNM8mmBKmYfR 5 | 178.1199 | USDT |
| 3dJRN3z279YhgJi K5whcTaS8PATy YsyZ7uBfc9p98L2 QrqEnPDmfBHtbo PV574SQ8SCmzM 8oNzJBnDPpc7gC YCjD | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 8PQHF4uXgcET6f wFLDnRGv4BBfpt Xq7jMoM4zTpwr wxj | 170.9999 | USDT |
| YetDsHCkq46MC YYEswWfhyYER YvtMKkEmdHC8 wkccABeyDopb41 SRFZvTx8MUy3Tf ztq37UzKi53t34Xy W4U6Hh | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 8PQHF4uXgcET6f wFLDnRGv4BBfpt Xq7jMoM4zTpwr wxj | 113.9999 | USDT |
| hb8oiGBv1Kcuzra2 QTQgvbSHsYrkT UWKtL3hKPE3Bg ghDwmZisamakN D4WxR1JN8NgM HsH2u43TYCZ7rj M6qphD | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 7YfGnKcj9qVr1nh ySnBq6k8jkhThqZ KFK6n2FG1xs8Vs | 1994.9999 | USDT |
| 5wS6foefi74wo6H UrGZBshzw3TXw PyQjqmfMXBv7tE h81fjV3CUSoGzu UpAbsQ2vs535bsD bgrwA5Hb6TEAos AT | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 7YfGnKcj9qVr1nh ySnBq6k8jkhThqZ KFK6n2FG1xs8Vs | 1709.9999 | USDT |
| RdfywgSrfMzMam tgXUhecpcHC4g6K | BWYfaakpoJUsp 5zwhuEdPhA2SY | 4fLm9WXA619Pf EbVN62RXk7Nidg | 1282.4999 | USDT |

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|--|--|---|-----------|------|
| BtLkDVX4ZLTR WfidQTxDVhMfg m8bGxnM1q6Y3y QMPPws3Ycj6UV 62X4NyPp | VWabTwQTe8fX WXjzze | jQ9iRkDAypCML Qnt5 | | |
| 3ZqhGxrrE8QNX4 u7Fxqy5W4fCFVfe QfZCX1yjeU6GPE XQqDHXugCkueD 4RnP48fSw8npnEi e1FdVtpD1yGvsY LRT | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 4fLm9WXA619Pf EbVN62RXk7Nidg jQ9iRkDAypCML Qnt5 | 356.2499 | USDT |
| 3rsGkNgPEn7ePgh 4cKCFqw27hJ6M Hu7NuBXN2fipx9 EZo4QL2Kfcx4X8 AUoWnq8NVMY DxRwbzR5VnTkD ChrNUfze | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 6Ri2kYD7vjjz7gc9 HRmi6oHed4wpU mdvnvviAMKcCc4 F | 1097.7099 | USDT |
| 5grJe9PccP4jaoDV AdFV97q7k13Dqx V4d6bDhUTkh9sA nJXWLsd5JZaspW mEofZEx6yCVCa DGJFYqyg5p4Y15 sbC | BWYfaakpoJUsp 5zwhuEdPhA2SY VWabTwQTe8fX WXjzze | 6Ri2kYD7vjjz7gc9 HRmi6oHed4wpU mdvnvviAMKcCc4 F | 1116.2499 | USDT |
| 29h6dnJ5j4hwiuBY zsqWYvUhU941M BMYViY8C4cnnw xQqXZorGfQ6Xtn ZTf3zhXyEXVW1 oygvWMJGvFt1Us 3mjr7 | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | 7Dx3hqvizzevSX2c SwMqEVYnASTfS 5E2smTZmQ4zCg vSN | 297.60202 | USDT |
| 3GZvczvh34dvME DAjKEGpXQ7ob3 CuiV56cpvULkYA gr7BHJqh8g4AyhT 4g2j6Pi9iyo6HA2Y yeLiDXLNUVzj7z Hq | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | 5Cve8q4bumxp5k nd28guwQyGkQRt a1H324geCoeo8acc | 51.0067 | USDT |
| 2x8wNShNt3xHdC oDsVKC9B3cFj5Z 7GwbboovUvpnFZ kQ5rmExFLBBpfZ 9FtsWtjkgpEReYs | FWznbCNXWQu HTawe9RxvQ2L dCENssh12dsznf 4RiouN5 | 8w4F3Y99Tck8viX URAvHmsR16vvb 6v6S7CA59w5Nd G2q | 248.0253 | USDT |

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|--|---|--|------------|------|
| NBLa979H2pi8teh dh | | | | |
| 0x0f3716ee880ebd e84985614430cc80 7cf1e16ba78f896eb 4fdbe21e629e5c1f4 | 0x1aDb69bF473 7aF3Ce1B6Cd07 8D920b4975a89F D | 0x78Bc78E4b7b71 87a1102a00A9BD6 7A02e996BAD1 | 500,010.04 | USDC |
| 0x172c03726329c0 07f83f5f797a16644 ecddfd9f38fe6ec5 7de79a85d06353f | 0x1aDb69bF473 7aF3Ce1B6Cd07 8D920b4975a89F D | 0xD594DD63B551 663208Fc658E82E 77b58a2F4f26d | 200,010.03 | USDC |

- a. For each account identified in response to Request 1 (the “Accounts”), Documents sufficient to identify the holder(s) of the Account, all Kraken accounts they hold, their current residential or billing address(es), telephone number(s), email address(es), credit card numbers, checking account numbers, and any other financial institution or service used by the Account holder to transfer funds to or from Kraken.
- b. Documents sufficient to identify IP address(es) used to connect to each Account.
- c. All account opening Documents or user information for each Account.
- d. For each Account, Documents sufficient to identify the Account’s Kraken transaction history (including any transactions which were reversed or failed in processing), including, but not limited to, for each transaction, Documents sufficient to identify:
 - i. The participating accounts;
 - ii. Date and time;
 - iii. Transaction identifiers for withdrawals and deposits off of the Account, to include blockchain identifiers such as tx hash, external (non-Account) address, blockchain epoch and/or datetime, and USD estimate prices at the time of the transaction;
 - iv. Assets exchanged in orders;
 - v. Sum volume of assets in orders, separated by buy and sell;
 - vi. USD estimate price(s) of above orders;
 - vii. Total transaction count for orders;

viii. Linked financial institutions, if any, including their names and addresses, and their routing and account number(s) for the origination to, and destination from, Kraken; and

ix. Instructions, or memo line or description, associated with the transaction.

2. All Communications between Kraken and the holder(s) of each Account.



U.S. Securities and Exchange Commission

Data Delivery Standards

This document describes the technical requirements for paper and electronic document productions to the U.S. Securities and Exchange Commission (SEC). ****Any questions or proposed file formats other than those described below must be discussed with the legal and technical staff of the SEC Division of Enforcement prior to submission.****

| | |
|---|---|
| General Instructions..... | 1 |
| Delivery Formats..... | 2 |
| I. Imaged Productions..... | 3 |
| 1. Images..... | 3 |
| 2. Image Cross-Reference File | 3 |
| 3. Data File..... | 3 |
| 4. Text..... | 3 |
| 5. Linked Native Files | 3 |
| II. Native File Productions without Load Files..... | 4 |
| III. Adobe PDF File Productions..... | 4 |
| IV. Audio Files..... | 4 |
| V. Video Files | 4 |
| VI. Electronic Phone Records | 4 |
| VII. Electronic Trade and Bank Records..... | 4 |
| VIII. Audit Workpapers | 5 |
| IX. Mobile Device Data | 5 |

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In the event produced files require the use of proprietary software not commonly found in the workplace, the SEC will explore other format options with the producing party.

The proposed use of file de-duplication methodologies or *computer-assisted review* or *technology-assisted review* (TAR) during the processing of documents must be discussed with and approved by the legal and technical staff of the Division of Enforcement (ENF). If your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name and file location and, 2) make that unique metadata part of your production to the SEC.

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 - c. A list of custodians, identifying the Bates range for each custodian
 - d. A list of redacted documents and the redaction reason
 - e. The time zone in which the emails were standardized during conversion
 - f. Whether the production contains native files produced from Mac operating system environments
2. Data can be produced on CD, DVD, thumb drive, etc., using the media requiring the least number of deliverables and labeled with the following:
 - a. Case number
 - b. Production date
 - c. Producing party
 - d. Bates range (if applicable)
3. All submissions must be organized by **custodian** unless otherwise instructed.
4. All document family groups, i.e. email attachments, embedded files, etc., should be produced together and children files should follow parent files sequentially in the Bates numbering.
5. All load-ready collections should include only one data load file and one image pointer file.
6. All load-ready text must be produced as separate document-level text files.
7. All load-ready collections should account for custodians in the custodian field.
8. All load-ready collections must provide the extracted contents of any container files to ensure all relevant files are produced as separate records.
9. Audio files should be separated from data files if both are included in the production.
10. Only alphanumeric characters and the underscore character are permitted in file names and folder names. Special characters are not permitted.
11. All electronic productions submitted on media must be produced using industry standard self-extracting encryption software.
12. The SEC uses 7zip to access compressed files. Note that the SEC **cannot** accept files that use AES-256 Jpeg or pkAES-256-Cert Deflate compression methods, even if the files are created with 7zip. If you have any questions or need additional information, please reach out to the requesting SEC staff member.
13. Electronic productions of 30 GB or less are strongly encouraged to be submitted via Secure File Transfer. All Secure File Transfers should be sent to the SEC Centralized Production Unit (ENF-CPU@sec.gov) with a CC to the requesting SEC staff member. If you do not have your own Secure File Transfer application, you may reach out to the requesting SEC staff member for a link to the SEC system in order to upload your production. If using the SEC Secure File Transfer system, you will NOT be able to CC individuals outside the SEC on your upload transmission. Note that the SEC **cannot** accept productions made using file sharing sites such as Google Drive or Microsoft Office 365.
14. Productions containing BSA or SAR material must be encrypted. Secure File Transfer applications may be used to produce BSA or SAR material. BSA or SAR material should be segregated and appropriately marked as BSA or SAR, or should be produced separately from other case related records.
15. Passwords for electronic documents, files, compressed archives and encrypted media must be provided separately either via email or in a cover letter apart from the media.
16. All electronic productions should be produced free of computer viruses.
17. Before producing forensically collected images, parties should reach out to the requesting SEC staff member in order to discuss appropriate handling.
18. Before producing unique data sets (large sets of relational data, website reconstruction, chat room data, etc.), parties should reach out to the requesting SEC staff member in order to discuss an appropriate production format.
19. Additional technical descriptions can be found in the addendum to this document.

Please note that productions sent to the SEC via United States Postal Service are subject to Mail Irradiation, and as a result electronic productions may be damaged.

Delivery Formats

I. Imaged Productions

The SEC prefers that all scanned paper and electronic file collections be produced in a structured format including industry standard load files, Bates numbered image files, native files and searchable document-level text files. Bates numbers should not contain spaces. Hyphens (-) and underscores (_) are acceptable.

1. Images

- a. Black and white images must be 300 DPI Group IV single-page TIFF files
- b. Color images must be produced in JPEG format
- c. File names cannot contain embedded spaces or special characters (including the comma)
- d. Folder names cannot contain embedded spaces or special characters (including the comma)
- e. All image files must have a unique file name, i.e. Bates number
- f. Images must be endorsed with sequential Bates numbers in the lower right corner of each image
- g. The number of image files per folder should not exceed 2,000 files
- h. Excel spreadsheets should have a placeholder image named by the Bates number of the file
- i. AUTOCAD/photograph files should be produced as a single page JPEG file

2. Image Cross-Reference File

The image cross-reference file (.LOG or .OPT) links the images to the database records. It should be a comma-delimited file consisting of seven fields per line with a line in the cross-reference file for every image in the database with the following format:

ImageID,VolumeLabel,ImageFilePath,DocumentBreak,FolderBreak,BoxBreak,PageCount

3. Data File

The data file (.DAT) contains all of the fielded information that will be loaded into the database.

- a. The first line of the .DAT file must be a header row identifying the field names
- b. The .DAT file must use the following *Concordance*® default delimiters:
 - Comma ¶ ASCII character (020)
 - Quote ¢ ASCII character (254)
- c. If the .DAT file is produced in Unicode format it must contain the byte order marker
- d. Date fields should be provided in the format: mm/dd/yyyy
- e. Date and time fields must be two separate fields
- f. The time zone must be included in all time fields
- g. If the production includes imaged emails and attachments, the attachment fields must be included to preserve the parent/child relationship between an email and its attachments
- h. An OCRPATH field must be included to provide the file path and name of the extracted text file on the produced storage media. The text file must be named after the FIRSTBATES. Do not include the text in the .DAT file.
- i. For productions with native files, a LINK field must be included to provide the file path and name of the native file on the produced storage media. The native file must be named after the FIRSTBATES.
- j. BEGATTACH and ENDATTACH fields must be two separate fields
- k. A complete list of metadata fields is available in **Addendum A** to this document

4. Text

Text must be produced as separate document-level text files, not as fields within the .DAT file. The text files must be named per the FIRSTBATES/Image Key and the full path to the text file (OCRPATH) should be included in the .DAT file. Text files may be in either ANSI or Unicode format, however, ALL text files must be in the same format within the same production. Note that productions containing text with foreign characters must produce text files in Unicode format to preserve the foreign characters. Text files must be in a separate folder, and the number of text files per folder should not exceed 2,000 files. There should be no special characters (including commas) in the folder names. For redacted documents, provide the full text for the redacted version.

5. Linked Native Files

Copies of original email and native file documents/attachments must be included for all electronic productions.

- a. Native file documents must be named per the FIRSTBATES number
- b. The full path of the native file must be provided in the .DAT file for the LINK field
- c. The number of native files per folder should not exceed 2,000 files

II. Native File Production without Load Files

With prior approval, native files may be produced without load files. Native file productions should not be Bates numbered. Native files must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. Native email files (.PST or .MBOX) must be separated by custodian.

III. Adobe PDF File Production

With prior approval, Adobe PDF files may be produced in native file format.

1. All PDFs must be unitized at the document level, i.e. each PDF must represent a discrete document.
2. PDF files should be produced in separate folders named by the custodian. The folders should not contain any special characters (including commas).
3. All PDF files must contain embedded text that includes all discernible words within the document, not selected text or image only. This requires all layers of the PDF to be flattened first.
4. If PDF files are Bates endorsed, the PDF files must be named by the Bates range.

IV. Audio Files

Audio files from telephone recording systems must be produced in a format that is playable using Microsoft Windows Media Player™. Additionally, the call information (metadata) related to each audio recording MUST be provided. The metadata file must be produced in a delimited text format. Field names must be included in the first row of the text file.

The metadata must include, at a minimum, the following fields:

- | | |
|------------------------|--|
| 1) Caller Name: | Caller's name or account/identification number |
| 2) Originating Number: | Caller's phone number |
| 3) Called Party Name: | Called party's name |
| 4) Terminating Number: | Called party's phone number |
| 5) Date: | Date of call |
| 6) Time: | Time of call |
| 7) Filename: | Filename of audio file |

V. Video Files

Video files must be produced in a format that is playable using Microsoft Windows Media Player™.

VI. Electronic Phone Records

When producing an MS Excel spreadsheet for electronic phone records, provide the files in the following format:

1. MS Excel spreadsheet with header information detailing the field structure. If any special codes exist in the dataset, a separate document must be provided that details all such codes. If details of the field structure do not fit in the header, a separate document must be provided that includes such details. Data must be formatted in its native format (i.e. dates in a date format, numbers in an appropriate numerical format, and numbers with leading zeroes as text).
 - a. The metadata that must be included is outlined in **Addendum B** of this document. Each field of data must be loaded into a separate column. For example, Date and Start_Time must be produced in separate columns and not combined into a single column containing both pieces of information. Any fields of data that are provided in addition to those listed in **Addendum B** must also be loaded into separate columns.

VII. Electronic Trade and Bank Records

When producing electronic trade records, bank records, or financial statements, provide the files in one of the following formats:

1. MS Excel spreadsheet with header information detailing the field structure. If any special codes exist in the dataset, a separate document must be provided that details all such codes. If details of the field structure do not fit in the header, a separate document must be provided that includes such details. The fields and information that must be included are outlined in **Addendum C** of this document.
2. Delimited text file with header information detailing the field structure. The preferred delimiter is a vertical bar "|". If any special codes exist in the dataset, a separate document must be provided that details all such codes. If details of the field structure do not fit in the header, a separate document must be provided that includes such details. The fields and information that must be included are outlined in **Addendum C** of this document.

VIII. Audit Workpapers

The SEC prefers for workpapers to be produced in two formats: (1) With Bates numbers in accordance with the SEC Data Delivery Standards; and (2) in native format via laptop computer, web-based viewing platform, or otherwise, allowing for viewing in the same format and organization as the firm's audit team. Prior to production of workpapers via laptop computer or web-based viewing platform, audit firms should contact the requesting SEC staff member for additional information and written agreements addressing use of software, access, and viewing protocols.

IX. Mobile Device Data

Before producing any mobile device data (including but not limited to text messages and application data) parties should reach out to the requesting SEC staff member in order to discuss the appropriate production format. Productions containing chat data from applications must be identified at the time of production and the following information must be provided to the requesting SEC staff member and the SEC Centralized Production Unit: chat application, chat data format, and how the length of a chat is determined (i.e. set duration of time, number of minutes without messages, etc.)

ADDENDUM A

The metadata of electronic document collections should be extracted and provided in a .DAT file using the field definition and formatting described below:

| Field Name | Sample Data | Description |
|---------------------|--|---|
| FIRSTBATES | EDC0000001 | First Bates number of native file document/email |
| LASTBATES | EDC0000001 | Last Bates number of native file document/email **The LASTBATES field should be populated for single page documents/emails. |
| ATTACHRANGE | EDC0000001 - EDC0000015 | Bates number of the first page of the parent document to the Bates number of the last page of the last attachment "child" document |
| BEGATTACH | EDC0000001 | First Bates number of attachment range |
| ENDATTACH | EDC0000015 | Last Bates number of attachment range |
| PARENT_BATES | EDC0000001 | First Bates number of parent document/Email **This PARENT_BATES field should be populated in each record representing an attachment "child" document |
| CHILD_BATES | EDC0000002; EDC0000014 | First Bates number of "child" attachment(s); can be more than one Bates number listed depending on the number of attachments **The CHILD_BATES field should be populated in each record representing a "parent" document |
| CUSTODIAN | Smith, John | Email: Mailbox where the email resided Native: Name of the individual or department from whose files the document originated |
| FROM | John Smith | Email: Sender Native: Author(s) of document **semi-colon should be used to separate multiple entries |
| TO | Coffman, Janice; LeeW [mailto:LeeW@MSN.com] | Recipient(s) **semi-colon should be used to separate multiple entries |
| CC | Frank Thompson [mailto:frank_Thompson@cdt.com] | Carbon copy recipient(s) **semi-colon should be used to separate multiple entries |
| BCC | John Cain | Blind carbon copy recipient(s) **semi-colon should be used to separate multiple entries |
| SUBJECT | Board Meeting Minutes | Email: Subject line of the email Native: Title of document (if available) |
| FILE_NAME | BoardMeetingMinutes.docx | Native: Name of the original native file, including extension |
| DATE_SENT | 10/12/2010 | Email: Date the email was sent Native: (empty) |
| TIME_SENT/TIME_ZONE | 07:05 PM GMT | Email: Time the email was sent/ Time zone in which the emails were standardized during conversion. Native: (empty) **This data must be a separate field and cannot be combined with the DATE_SENT field |
| TIME_ZONE | GMT | The time zone in which the emails were standardized during conversion. Email: Time zone Native: (empty) |

| | | |
|------------------------|--|--|
| LINK | D:\001\EDC0000001.msg | Hyperlink to the email or native file document **The linked file must be named per the FIRSTBATES number |
| MIME_TYPE | application/msword | The content type of an email or native file document as identified/extracted from the header |
| FILE_EXTEN | MSG | The file type extension representing the email or native file document; will vary depending on the format |
| AUTHOR | John Smith | Email: (empty) Native: Author of the document |
| LAST_AUTHOR | Jane Doe | Email: (empty) Native: Last Author of the document |
| DATE_CREATED | 10/10/2010 | Email: (empty) Native: Date the document was created |
| TIME_CREATED/TIME_ZONE | 10:25 AM GMT | Email: (empty) Native: Time the document was created including time zone **This data must be a separate field and cannot be combined with the DATE_CREATED field |
| DATE_MOD | 10/12/2010 | Email: (empty) Native: Date the document was last modified |
| TIME_MOD/TIME_ZONE | 07:00 PM GMT | Email: (empty) Native: Time the document was last modified including the time zone **This data must be a separate field and cannot be combined with the DATE_MOD field |
| DATE_ACCESSD | 10/12/2010 | Email: (empty) Native: Date the document was last accessed |
| TIME_ACCESSD/TIME_ZONE | 07:00 PM GMT | Email: (empty) Native: Time the document was last accessed including the time zone **This data must be a separate field and cannot be combined with the DATE_ACCESSD field |
| PRINTED_DATE | 10/12/2010 | Email: (empty) Native: Date the document was last printed |
| FILE_SIZE | 5,952 | Size of native file document/email in KB |
| PGCOUNT | 1 | Number of pages in native file document/email |
| PATH | J:\Shared\SmithJ\October Agenda.doc | Email: (empty) Native: Path where native file document was stored including original file name. |
| INTFILEPATH | Personal Folders\Deleted Items\Board Meeting Minutes.msg | Email: original location of email including original file name. Native: (empty) |
| INTMSGID | <000805c2c71b\$75977050\$cb8306d1@MSN> | Email: Unique Message ID Native: (empty) |

| | | |
|---------|--|--|
| HEADER | Return-Path: <example_from@dc.edu> X-SpamCatcher-Score:1[X] Received:from[136.167.40.119] (HELO dc.edu) by fe3.dc.edu (CommuniGate Pro SMTP4.1.8) with ESMTP-TLS id 61258719 for example_to@mail.dc.edu; Mon, 23 Aug 2004 11:40:10 - 0400 Message-ID: <4129F3CA.2020509@dc.edu> Date: Mon, 23 Aug 2005 11:40:36 -400 From: Taylor Evans <example_from@dc.edu> User-Agent:Mozilla/5.0 (Windows;U; Windows NT 5.1; en-US;rv:1.0.1) Gecko/20020823 Netscape/7.0 X-Accept-Language:en-us,en MIME-Version:1.0 To: Jon Smith <example_to@mail.dc.edu> Subject:Business Development Meeting Content-Type: text/plain;charset=us-ascii; format=flowed Content-Transfer-Encoding:7bit | Email: The email header information Native: (empty) |
| SHA256 | AD6128C5CA40164AF71A1E FC800E12D2F195CE07BB5F8 C813B0888A2DDE6A06F | SHA-256 hash value of the document. |
| OCRPATH | TEXT/001/EDC0000001.txt | Path to extracted text of the native file |

Sample Image Cross-Reference File:

```

IMG0000001,,E:\001\IMG0000001.TIF,Y,,,
IMG0000002,,E:\001\IMG0000002.TIF,,,,
IMG0000003,,E:\001\IMG0000003.TIF,,,,
IMG0000004,,E:\001\IMG0000004.TIF,Y,,,
IMG0000005,,E:\001\IMG0000005.TIF,Y,,,
IMG0000006,,E:\001\IMG0000006.TIF,,,,

```


ADDENDUM B

For Electronic Phone Records, include the following fields in separate columns:

For Calls:

- 1) Account Number
- 2) Connection Date – Date the call was received or made
- 3) Connection Time – Time call was received or made
- 4) Seizure Time – Time it took for the call to be placed in seconds
- 5) Originating Number – Phone that placed the call
- 6) Terminating Number – Phone that received the call
- 7) Elapsed Time – The length of time the call lasted, preferably in seconds
- 8) End Time – The time the call ended
- 9) Number Dialed – Actual number dialed
- 10) IMEI Originating – Unique id to phone used to make call
- 11) IMEI Terminating– Unique id to phone used to receive call
- 12) IMSI Originating – Unique id to phone used to make call
- 13) IMSI Terminating- Unique id to phone used to receive call
- 14) Call Codes – Identify call direction or other routing information
- 15) Time Zone – Time Zone in which the call was received or placed, if applicable

For Text Messages:

- 1) Account Number
- 2) Connection Date – Date the text was received or made
- 3) Connection Time – Time text was received or made
- 4) Originating Number – Who placed the text
- 5) Terminating Number – Who received the text
- 6) IMEI Originating – Unique id to phone used to make text
- 7) IMEI Terminating– Unique id to phone used to receive text
- 8) IMSI Originating - Unique id to phone used to make text
- 9) IMSI Terminating- Unique id to phone used to receive text
- 10) Text Code – Identify text direction, or other text routing information
- 11) Text Type Code – Type of text message (sent SMS, MMS, or other)
- 12) Time Zone – Time Zone in which the call was received or placed, if applicable

For Mobile Data Usage:

- 1) Account Number
- 2) Connection Date – Date the data was received or made
- 3) Connection Time – Time data was received or made
- 4) Originating number – Number that used data
- 5) IMEI Originating – Unique id of phone that used data
- 6) IMSI Originating - Unique id of phone that used data
- 7) Data or Data codes – Identify data direction, or other data routing information
- 8) Time Zone – Time Zone in which the call was received or placed, if applicable

ADDENDUM C

For electronic account transaction data in MS Excel spreadsheet file format, or in a delimited text file format with a preferred vertical bar delimiter, include the following (or similar) fields of information in **columnar form** and in **separate tabs** of the spreadsheet/delimited text file:

A. Account Information Tab

Listing of accounts produced showing the following:

1. Account Title
2. Account Address
3. Account Number
4. Account Type
5. Taxpayer Identification #
6. Account Open Date
7. Account Closed Date
8. Account Owners/Signatories
9. Relationship (e.g., CEO, CFO, officer, treasurer, founding member, account owner, etc.)

B. Account Transaction Information Tab

Download of transaction data for all accounts produced showing the following:

1. Account Number
2. Transaction ID #
3. Transaction Type (e.g., deposit, withdrawal, check, incoming wire, outgoing wire, ACH transaction, account transfer, account fee, cashiers check, etc.)
4. Transaction Post Date
5. Transaction Date
6. Transaction Amount
7. Transaction Amount Code (e.g., debit or credit)
8. Check#
9. Transaction Description (e.g., payor/payee of transaction, name of merchant/business or individual receiving or depositing funds, etc.)
10. Account Balance

C. Detail Information Tab for Wire Transfers, ACH Transactions, and Other Bank/Account Transfers

Download of additional information concerning any of the transactions in Section B, related to any wire transfer, ACH transaction, and other bank/account transfer transaction information showing the following or similar information:

1. Account Number
2. Transaction Reference #
3. Transaction Date (date that transaction posts to an account)
4. Transaction Type (e.g., incoming/outgoing wire, incoming/outgoing ACH transaction, incoming/outgoing other bank/account transfer, etc.)
5. Transaction Amount
6. Transaction Amount Code (e.g., debit or credit)
7. Originator Name
8. Originator Address
9. Originator ID / Bank Acct# (bank account# of the debit/payor side of the wire)
10. Beneficiary Name
11. Beneficiary Address
12. Beneficiary ID / Bank Acct# (bank account# of the credit/payee side of the wire)
13. Debit ID (bank name and address for debit/payor side of transaction)
14. Credit ID (bank name and address for credit/payee side of transaction)

15. Originator to Beneficiary Information
16. Bank to Bank Instruction
17. Other available wire transaction information captured by bank that is not referenced above

D. Legend Tab

Listing of any codes used or contained in the information provided above.